

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOHN D. SAMUEL,

Plaintiff,

- against -

JP MORGAN CHASE BANK, THOMAS
ENGLE, and AL CARPETTO,

Defendants.

07 Civ. 9547 (SHS) (THK)

**DEFENDANTS' RULE 26
DISCLOSURE STATEMENT**

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30, Defendants JPMorgan Chase Bank, N.A., incorrectly named herein as JP Morgan Chase Bank (“JPMC”), Thomas Engle and Al Carpetto, by their attorneys, the JPMorgan Chase Legal & Compliance Department, Stacey L. Blecher, Assistant General Counsel, as and for their disclosure pursuant to Fed. R. Civ. P. 26, asserts as follows:

A. The name and, if known, the address and telephone number of each individual, other than Plaintiff John D. Samuel, likely to have discoverable information that the disclosing party may use to support its claims or defenses:

Name

Address

Thomas Engle

c/o J.P. Morgan Chase Legal Department, 1 Chase Manhattan Plaza,
26th Floor, New York, New York 10081 (212) 552-3814

Alfred Carpetto

c/o J.P. Morgan Chase Legal Department, 1 Chase Manhattan Plaza,
26th Floor, New York, New York 10081 (212) 552-3814

Caroline Cunningham

c/o J.P. Morgan Chase Legal Department, 1 Chase Manhattan Plaza,
26th Floor, New York, New York 10081 (212) 552-3814

Laura Cushing	c/o J.P. Morgan Chase Legal Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-3814
Ivy Tsui	c/o J.P. Morgan Chase Legal Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-3814
Kathy Knepper	c/o J.P. Morgan Chase Legal Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-3814

The individuals identified above are likely to have knowledge of Plaintiff's employment, job responsibilities and performance with JPMorgan Chase Bank, N.A. during portions of the relevant time period of some or all of the events referred to in Plaintiff's Complaint, and of relevant human resources policies and procedures in effect during the relevant time period.

B. Documents, data compilations, and tangible things that the disclosing party may use to support its claims and defenses:

- Plaintiff's employee records file, if any;
- Plaintiff's *accessHR* file, if any;
- Relevant documents and files, if any, maintained by any individual JPMorgan Chase Bank, N.A. manager or supervisor regarding Plaintiff;
- Relevant documents, data compilations, and files, if any, maintained by JPMorgan Chase Bank, N.A.'s Treasury and Securities concerning Plaintiff and/or its Western Hemisphere Sales Department ("WHEM");
- Relevant documents and files, if any, maintained by JPMorgan Chase Bank, N.A.'s Human Resources and Employee Relations Department concerning Plaintiff and/or WHEM;
- Relevant JPMorgan Chase Bank, N.A. policies, plans, and programs; and
- Relevant documentary communications, if any, whether in letter, memorandum, email, or other format, including, but not limited to the contents of Plaintiff's former computer drive.
- Any additional documents that may concern allegations set forth in Plaintiff's Complaint.

C. The provisions of Fed. R. Civ. P. 26(a)(1)(C) are not applicable because Defendants are not seeking damages at this time from Plaintiff.

D. JPMorgan Chase is not aware of any insurance agreements that apply to Plaintiff's claims.

Dated: December 21, 2007

**JPMorgan Chase Legal &
Compliance Department**

By: 

Stacey L. Blecher, Esq.

Attorneys for Defendants

One Chase Manhattan Plaza, Floor 26

New York, New York 10081

(212) 552-3814

Stacey.L.Blecher@Chase.com

To: Mark B. Stumer, Esq.
Mark B. Stumer & Associates, PC
Attorneys for Plaintiff
200 Park Avenue South, Suite 1511
New York, New York 10003
(212) 633-2225
wwym@aol.com

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
JOHN D. SAMUEL, : 07 CIV 9547 (SHS) (THK)
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Plaintiff, :
:
- against - :
:
JP MORGAN CHASE BANK, THOMAS ENGLE, :
and AL CARPETTO, :
:
:
Defendants, :
:
:
-----X

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

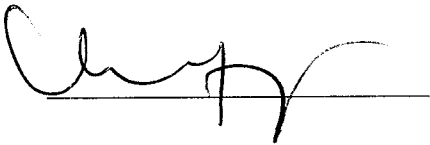
Mark Stumer, being duly sworn, deposes and says, that deponent is not a party to the action, is over eighteen years of age and is employed by JPMorgan Chase Bank, N.A.

That on the 21 st day of December, 2007 deponent served the within by Mail:

DEFENDANTS' RULE 26 DISCLOSURE STATEMENT

UPON: Mark B. Stumer & Associates, PC
Mark B. Stumer, Esq.
Attorney(s) for Plaintiff
200 Park Avenue South, Suite 1511
New York, New York 10003
(212) 633-2225
Wwym@aol.com

by the address designated for that purpose by depositing a true copy of same enclosed in a postpaid properly addressed wrapper in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York.



Sworn to before me this
21 day of December, 2007
Vivian Patricia Falconi
Notary Public VIVIAN PATRICIA FALCONI
Notary Public, State of New York
No. 41-4835878
Qualified in Queens County
Certificate Filed in New York County
Commission Expires Aug 31, 2009
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